

# Exhibit 1

Court orders.

27. Headwater objects to the definition of the terms “Infringe” and “Infringement” as overbroad and unduly burdensome. Headwater will interpret the term using its legal, common and ordinary meaning.

28. Headwater objects to the definitions of the term “Person” because it makes each request that references a person vague, ambiguous, overbroad, and unduly burdensome. Headwater will interpret this term using its common and ordinary meaning.

29. Headwater objects to the definition of the terms “or” and “and” as overbroad and unduly burdensome. Headwater will interpret these terms using its common and ordinary meaning.

30. Headwater objects to Defendants’ Instructions as overbroad, unduly burdensome and calling for a legal conclusion. Headwater will provide responses and produce documents, subject to its objections consistent with applicable statutes, the Federal Rules of Civil Procedure, the rules of this District and any court orders.

#### **SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES**

##### **INTERROGATORY NO. 25**

For each Request for Admission served on You in this litigation that You denied in whole or in part, state in detail the basis for the denial, including identifying the relevant documents, information, testimony supporting the denial and identifying the knowledgeable individuals.

##### **RESPONSE TO INTERROGATORY NO. 25:**

Headwater objects to this Interrogatory as compound and including multiple parts in circumvention of the discovery limits applicable to this action. Headwater objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection. Headwater further objects that this Interrogatory is overbroad and unduly burdensome. Headwater further

objects to this Interrogatory to the extent that it seeks information in Defendants’ possession, custody or control, or that is equally accessible to Defendants from public sources or from third parties. Headwater further objects to this Interrogatory to the extent that it seeks information that is outside of Headwater’s possession, custody, and control. Headwater further objects to this Interrogatory as premature and calling for improper discovery of expert opinion. Headwater further objects to this Interrogatory as premature to the extent that it seeks to require Headwater to marshal all of its proof or any proof it intends to rely on at any hearing, trial, submission to the Court, or deposition in this matter.

Dated: September 9, 2024

Respectfully submitted,

/s/ Marc Fenster

Marc Fenster  
CA State Bar No. 181067  
Email: mfenster@raklaw.com  
Reza Mirzaie  
CA State Bar No. 246953  
Email: rmirzaie@raklaw.com  
Brian Ledahl  
CA State Bar No. 186579  
Email: bledahl@raklaw.com  
Ben Wang  
CA State Bar No. 228712  
Email: bwang@raklaw.com  
Adam Hoffman  
CA State Bar No. 218740  
Email: ahoffman@raklaw.com  
Dale Chang  
CA State Bar No. 248657  
Email: dchang@raklaw.com  
Paul Kroeger  
CA State Bar No. 229074  
Email: pkroeger@raklaw.com  
Neil A. Rubin  
CA State Bar No. 250761  
Email: nrubin@raklaw.com  
Kristopher Davis